

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
EDREWEENE RAYMOND, PEDRO SERRANO,  
SANDY GONZALEZ, and RITCHIE BAEZ,

Plaintiffs,

-against-

THE CITY OF NEW YORK, WILLIAM J. BRATTON,  
JAMES P. O'NEILL, CHRISTOPHER McCORMACK,  
and CONSTANTIN TSACHAS,

Defendants.  
----- X

15 CV 6885 (LTS)(SLC)

**NOTICE OF MOTION FOR  
SUMMARY JUDGMENT**

**PLEASE TAKE NOTICE** that upon the accompanying statement pursuant to Rule 56.1 of the Local Rules of this Court, dated May 17, 2021, the Declaration of Yuval Rubinstein, dated May 17, 2021, the exhibits annexed thereto, the Memorandum of Law in Support of Defendants' Motion for Summary Judgment, dated May 17, 2021, and upon all prior pleadings and proceedings, defendants will move this Court, before the Honorable Laura Taylor Swain, United States District Judge, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York for an order pursuant to Rule 56 of the Federal Rules of Civil Procedure for summary judgment dismissing all of plaintiffs' causes of action on the grounds that there is no issue material fact requiring a trial and that, as a matter of law, defendants are entitled to summary judgment in this action, and for such other and further relief as the Court may deem just and proper.

**CERTIFICATION:** In accordance with the Court's March 16, 2021 Order and Judge Swain's Individual Practices, ¶2(b)(i), defendants used their best efforts to resolve informally the issues raised in their anticipated motion for summary judgment. Defendants sent

plaintiffs a detailed letter on April 23, 2021 summarizing the legal and factual positions of their anticipated motion. Plaintiffs responded by letter dated May 11, 2021. The parties engaged in a meet and confer discussion by telephone on May 12, 2021.

Date: Brooklyn, New York  
May 17, 2021

JAMES E. JOHNSON  
Corporation Counsel  
of the City of New York  
Attorney for Defendants  
100 Church Street, Room 2-115  
New York, New York 10007  
(212) 356-2467  
yrubinst@law.nyc.gov

By:                     /s/                      
Yuval Rubinstein  
Assistant Corporation Counsel

TO: John A. Scola, Esq. (via ECF)  
Emeka Nwokoro, Esq. (via ECF)  
Counsel for Plaintiffs